



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

DEC 22 2011

REPLY TO THE ATTENTION OF:

E-19J

Karen Beason  
88<sup>th</sup> Air Base Wing/CEAOR  
1450 Littrell Road  
Wright-Patterson AFB, Ohio 45433-5209

**Re: Draft Environmental Impact Statement for Entry Control Reconfiguration and Base Perimeter Fence Relocation in Area A, Wright-Patterson Air Force Base, Fairborn, Montgomery County, Ohio - EIS No. 20110402**

Dear Ms. Beason:

The U.S. Environmental Protection Agency has reviewed the referenced Draft Environmental Impact Statement (Draft EIS) prepared by the 88<sup>th</sup> Air Base Wing (88 ABW) pursuant to our authorities under the National Environmental Policy Act (NEPA), Council on Environmental Quality regulations (40 CFR Parts 1500-1508), Section 309 of the Clean Air Act, and Section 404 of the Clean Water Act.

The proposed project involves re-routing State Route 444 (SR 444) at Wright-Patterson Air Force Base (AFB), including re-locating portions of the existing perimeter fence to comply with Anti-Terrorism Force Protection (ATFP) requirements set forth by the Department of Defense (DoD). Under the ATFP regulation, the stand-off distance between on-base buildings and the base perimeter fence is required to be a minimum of 82 feet. Currently, buildings are as close as 60 feet. The project consists of five major actions:

1. Relocate and reconfigure Gate 1A north of existing Gate 39A, and demolish Gate 39A.
2. Reconfigure Gate 15A to extend past Communications Boulevard (main gate).
3. Relocate Gate 16A functions to Gate 26A. Gate 16A will remain open.
4. Relocate and reconfigure Gate 26A north of the Circle Drive/State Route 235 intersection. A 14-stall commercial vehicle parking lot will also be constructed for vehicle inspections.
5. Relocate the existing base perimeter fence south of Gate 9A, including across SR 444 between Gates 15A and 1A. SR 444 traffic will be re-routed on Dayton-Yellow Springs Road.

88 ABW has selected Alternative A as the preferred alternative.

Based on our review of the Draft EIS, we have assigned a rating of *Environmental Concerns – Insufficient Information* (EC-2). Please see the enclosure titled “Summary of rating definitions and follow-up action” for a more detailed description of this rating. While we have not identified environmental impacts that should be avoided, we recommend 88 ABW address the following issues in the Final EIS: Missing consultation records, stream impacts, green infrastructure, transportation, and scope of alternatives, as stated below:

#### Missing Consultation Records

Please attach consultation documents regarding wetlands (U.S. Army Corps of Engineers) with Appendix A in the final EIS.

#### Stream Impacts

300 linear feet (lf) of Stream 1 are expected to be impacted by this project. 88 ABW intends to channel Stream 1 through a culvert system at Skeel Avenue, by Gate 15A. EPA recommends using open-bottom culverts to avoid altered hydrology and sedimentation, and to provide continuity for streambed aquatic habitat.

#### Green Infrastructure

The Draft EIS did not discuss “green” stormwater management. EPA recommends 88 ABW construct rain gardens and vegetated swales instead of relying heavily on traditional “gray” stormwater management (e.g. storm sewers). Green stormwater management would reduce stormwater volumes discharged off-site. Green stormwater management has also been shown to cost less to install and maintain than gray stormwater systems.

EPA recommends 88 ABW consider implementing green infrastructure set forth by Titles III, IV, and V of the Energy Independence and Security Act of 2007, and also Executive Order 13514, Federal Leadership in Environmental, Energy, and Economic Performance. EPA recommends 88 ABW consider using permeable pavement for sidewalks, parking lots, and roadways, where technically feasible. Recent studies have indicated that permeable pavement can be used in northern climates. EPA also encourages use of solar power, where applicable.

#### Transportation

The Draft EIS does not adequately describe the re-routing process that will occur for SR 444. Please provide a map that clearly outlines the proposed SR 444 route under Alternative A, including the location(s) of the Wright Brothers-Huffman Prairie Bikeway Path, and sidewalks along SR 444. The Draft EIS did not discuss how public transit will be impacted, both on and off base, for both the preferred alternative and the no-build option.

The re-routed SR 444, under Alternative A, will cross the Norfolk Southern rail line. 88 ABW has proposed upgrading the crossing warning system. Traffic modeling at this intersection indicates that traffic delays are likely to be greater than eighty seconds per vehicle. This is

labeled as Level of Service – F (LOS-F), which, according to page 4-36 of the Draft EIS, is a delay time that is “unacceptable to most drivers.” The Draft EIS did not mention the intensity of rail traffic on the Norfolk Southern line or the average delay time caused by passing trains. EPA strongly urges 88 AWB to construct grade separation at the rail line to help reduce traffic backups caused by trains if Alternative A remains the preferred alternative in the Final EIS.

The Draft EIS also pinpointed four signalized intersections (Draft EIS page 4-38), under Alternative A (year 2032 projection), that would be considered LOS-F, with delays reaching as high as 142 seconds per vehicle. Four intersections are expected to have increased traffic delay times by as high as 500% (Dayton-Yellow Springs Road at Kauffman Avenue) when compared to the no-action alternative. Such extensive delays will likely be unacceptable to motorists. Please evaluate intersection/interchange options that would provide efficient movement of expected traffic volume. Unless these LOS – F road and railroad intersections are improved, EPA questions whether Alternative A is the best alternative to the no-build option.

Scope of Alternatives

In addition to the No-Action Alternative, 88 ABW provided one alternative (Alternative A). EPA recommends 88 ABW develop and evaluate other re-routing paths that would meet ATFP requirements, while causing fewer traffic delays and allowing for better transportation linkage for SR 444, sidewalks, bus traffic, and the Wright Brothers-Huffman Prairie Bikeway Path, both on and off base.

EPA is available to discuss these comments to the Draft EIS at your convenience. Please feel free to contact Mike Sedlacek of my staff at 312-886-1765, or by email at [sedlacek.michael@epa.gov](mailto:sedlacek.michael@epa.gov) to discuss these comments.

Sincerely,



Kenneth A. Westlake, Chief  
NEPA Implementation Section  
Office of Enforcement and Compliance Assurance

cc: Mark Vonder Embse, FHWA  
Melanie Cota, USFWS  
Debbie Woischke, Ohio DNR  
Tim Hill, Ohio DOT

Enclosure: Summary of rating definitions and follow up action



## **\*SUMMARY OF RATING DEFINITIONS AND FOLLOW UP ACTION\***

### **Environmental Impact of the Action**

#### LO-Lack of Objections

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

#### EC-Environmental Concerns

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impacts. EPA would like to work with the lead agency to reduce these impacts.

#### EO-Environmental Objections

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

#### EU-Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

### **Adequacy of the Impact Statement**

#### Category 1-Adequate

The EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collecting is necessary, but the reviewer may suggest the addition of clarifying language or information.

#### Category 2-Insufficient Information

The draft EIS does not contain sufficient information for the EPA to fully assess the environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

#### Category 3-Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\*From EPA Manual 1640 Policy and Procedures for the Review of the Federal Actions Impacting the Environment

